

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2010 JUN 22 P 2:04

JON W. SANFILIPPO RANDA
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 10-CR-
[T. 29 U.S.C. § 501(c)]

10-CR-116

PAULA DORSEY,

Defendant.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

1. At all times material to this information, District Council 48 of the American Federation of State, County, and Municipal Employees (hereinafter AFSCME) operated at Milwaukee, Wisconsin.

2. At all times material to this information, District Council 48 of AFSCME was a labor organization within the meaning of 29 U.S.C. § 402(i).

3. At all times material to this information, Paula Dorsey was employed as an officer of District Council 48, specifically the president of that district council.

4. At various times in the period from 2004 through 2009, the international headquarters of AFSCME provided funds to District Council 48 to finance Operation Big Vote (OBV) in Wisconsin. OBV was a nonpartisan AFSCME program meant to encourage higher voting turnouts in elections by minority groups.

5. As President of District Council 48, the defendant had control over the OBV funds sent to Wisconsin but was expected to use those funds for the OBV program.

6. The defendant deposited those funds into an OBV account she established at Associated Bank in Milwaukee. The defendant was an authorized signer on that account.

7. On various occasions from on or about January 1, 2004 through on or about May 31, 2009, the defendant embezzled, stole, and willfully converted OBV funds to her own use by withdrawing funds from the OBV account and using them for her own personal purposes. She did so by various methods including:

- a. Writing checks against the OBV account which were deposited into the defendant's personal account;
- b. ATM withdrawals from the OBV account;
- c. Use of a debit card which charged expenditures to the OBV account; and
- d. Cash withdrawals from the OBV account.

8. In furtherance of the fraudulent scheme described above, on or about December 1, 2008, at Milwaukee, in the State and Eastern District of Wisconsin,

PAULA DORSEY,

acting with fraudulent intent, embezzled, stole, and willfully converted to her own use funds belonging to AFSCME and entrusted to District Council 48. She did so by using a debit card on the OBV account to expend \$532.50 at Potawatomi Bingo and Casino.

All in violation of Title 29, United States Code, Section 501(c).



JAMES L. SANTELLE
United States Attorney

Dated: June 22, 2010